

**Franklin Swampscott Information Request
Submitted to Massachusetts Electric
DTE 03 - 98**

Regarding Vintage Information

- 1) Mass Electric has stated that the Company does not have the vintage information for the street lights in either community. Can the Company provide the vintage information for the dedicated poles?
- 2) If the answer to question number 1 is negative, please explain why the Company was able to provide vintage information regarding the dedicated poles in Quincy? If the answer to question 1 is positive, please provide the installation dates for the 324 dedicated poles in Franklin and the 64 dedicated poles in Swampscott

Regarding Book Values used for Property Tax Compliance Reasons

- 3) Please provide the following numbers from the Company's books with respect to the plant values used by Mass Electric to establish net book value for property tax compliance reasons in 1962 and 1963

	1962	1963
Beginning Balance		
Additions		
Retirements		
Ending Balance		
Average Balance		
Depreciation Rate		
Depreciation		
Cumulative Reserve		
Net book Balance		

- 4) Please describe the documentation (receipts, work orders) used by the Company's plant accounting staff to establish calendar 2003 additions, and calendar 2003 retirements in Franklin and Swampscott, to be used for the purpose of calculating the net book value of the streetlight plant in Franklin and Swampscott as of December 31, 2003 for property tax compliance reasons.
- 5) Please provide us with the copies of the documentation (receipts, work orders, etc.) used to prepare the most recent calculation of net book value for tax compliance reasons in both communities.

Regarding Book Values Used for Streetlight Sale Purposes

- 6) We note in the data provided by the Company to support the Swampscott purchase price, the entry of \$74,044.39 for brackets in 1980. At the original installed costs shown for 1980 bracket installations in the data provided by Mass. Electric, this \$74,044.39 would relate to the installation 913 brackets in 1980. This would represent almost a wholesale replacement of the brackets in Swampscott in 1980. The Town has no record of or recollection of such a project. We also can not find any comparable entries regarding a wholesale replacement of streetlight fixtures in 1980 in the data you provided, or any comparable entries regarding comparable retirements of either existing brackets or existing fixtures in 1980. Your retirement data indicates that three brackets were retired in 1980.
 - a) Please explain the support documentation used to substantiate this 74,044.39 for new brackets in 1980.
 - b) Please provide that documentation.
 - c) Please explain why there is no comparable entries for fixture additions in 1980.
 - d) Please explain why there is no comparable entries for bracket retirements in 1980.
- 7) We note that the data provided by the Company to support the purchase price in Franklin indicates that \$95,207 was spent in Franklin in the years 1992 through 1995 installing new brackets. The Town has no record or recollection of this type of wholesale replacement of the brackets in Franklin. Please provide any documentation that you have that supports this bracket replacement project in Franklin.
- 8) With respect to the Company's data regarding the existing plant, the oldest bracket was installed in 1980 in Franklin and the same year, 1980, in Swampscott. With respect to the Company's data regarding the existing plant, the oldest foundation was installed in 1983 in Franklin and the same year 1983 in Swampscott. We are struck both by the relatively recent vintage of what we would normally expect to be very long lived equipment (brackets and foundations). We are also struck by the coincidence that the earliest installation of the brackets currently installed and foundations currently installed in both communities is the exact same year for both communities.
 - a) Are the dates used by Mass Electric for the entries in the gross plant investment column supported by actual field receipts and work orders, or are the dates used by Mass Electric based on a common assumption used in both communities.

b) Why are there no Mass Electric entries in 1979 or earlier in the gross plant investment column for brackets in either community?

c) Why are there no Mass Electric entries in 1982 or earlier in the gross plant investment column for foundations in either community?

9) The central factual dispute in this streetlight dispute is that the Towns have challenged the validity of the post sodium conversion additions in both communities. Mass Electric has stated these additions come directly from Mass Electric books. Does this mean that someone in plant accounting was looking at actual work orders or receipts for particular streetlight installations and inputting the totals of the dollars shown on those work orders or receipts for a particular year into the “gross investment column” of the data provided by the Company to support the purchase price? Please explain the documentation used by your plant accounting staff to derive the values used by plant accounting assigned to the gross plant investment column by PUC and by year. Please explain the documentation used to support and assign installation year, retirement year, and installation cost in the retirement data provided by the Company to support the purchase price.

10) Please provide the work orders or receipt or other documentation used to calculate the following three numbers provided by Mass Electric regarding streetlight installations in Franklin in 1999 and 2000:

\$1,776.99 for streetlight posts over 25” in Franklin installed in Franklin calendar 2000

\$6,161.97 for direct buried cable installed in Franklin in Calendar 1999

\$9,790.43 for streetlight post over 25’ installed in Franklin in calendar 1999

11) You have acknowledged in your answer in paragraph 30 that “that the plant, not purchase price, data provided to the petitioners does not report or utilize pre-additions during the period 1914 to 1963. Does the purchase price take into consideration “pre additions in the period 1914 to 1963”? If so, please explain how those “pre-additions” are factored into the purchase price and where in your purchase price documentation provided to the Towns that this pre additions data is included.

12) Does the unamortized investment calculated for tax compliance reasons take into consideration pre-additions during the period 1914 to 1963.

Regarding S3B Rate and Developer Funded Streetlight Installations

- 13) We were surprised to hear the Company's comments at the procedural conference regarding S3B activity in Franklin. How many lights in Franklin are on the S3B rate? How long have you billing Franklin for these streetlights at the S3B rate? Can you provide copies of one representative month of the S3B streetlight bills in calendar 1999 and one representative month of the S3B bills in calendar 2000?
- 14) Have any of the 233 dedicated poles included in your purchase price correspondence been inadvertently billed at the S20 rate? If so, for how long?
- 15) Should any of the lights included for sale in your list of streetlights to be included for sale be deleted from the purchase because they are actually S3B publicly owned streetlights?
- 16) Were any of the 233 dedicated poles shown proposed for sale by MECO to the Town of Franklin, installed by developers? If so which ones?
- 17) Can Mass Electric substantiate through expenditure receipts, or any other documentation, that Mass Electric incurred 100% of the costs of installing all dedicated poles and foundations in the Town of Franklin?

Other Questions

- 18) Please provide any record of Town requests for new installations in Franklin since January 1996 and in Swampscott since January 1994.
- 19) The Company provided data used to support the purchase price shows an entry of \$50,284 as the unamortized investment of equipment described as PUC 3739123, which is described as a streetlight fixture with 25,500 lumens. There is a similar entry in the Franklin data for the same equipment with a reported unamortized investment of \$11,323. Neither of the Towns are purchasing streetlight fixtures with 25,500 lumens. The information presented by the Company describing the allocation of plant value between different fixtures of different lumen sizes makes no reference to any fixture of that type. Please explain what equipment these dollars relate to. Please explain how the unamortized investment is allocated to these 25,500 lumen fixtures.

